

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: Nov. 23, 2011

Report By: Bob Gross

Time: 8:45 AM

Title: MAINT. TECH

RECEIVED

NOV 28 2011

BETHLEHEM DISTRICT OFF  
PA DEP

Location of Overflow:

( Include system, MH#, etc.)

LLRI - MANHOLE # B6

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow:

2 (gpm)

Duration of Overflow:

6 hrs

Minutes / Hours

Closest Receiving Natural Body of Water:

LITTLE LEHIGH CREEK

Describe Event :

Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

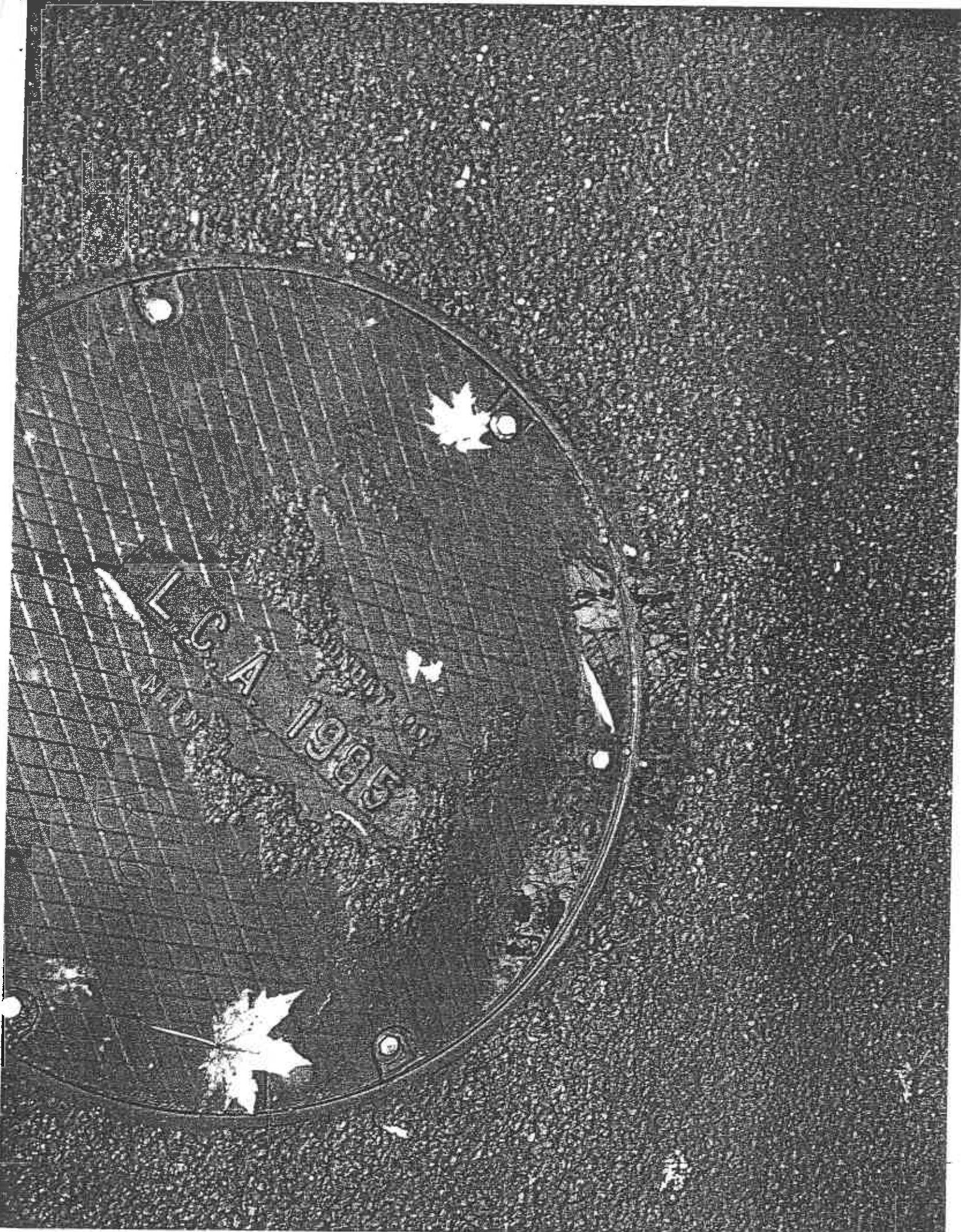
HEAVY RAIN 3"

Describe Remediation Efforts:

Signature: 

Date:

11-23-11



# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: Nov. 23, 2011

Report By: Bob Gross

Time: 9:10 AM

Title: MAINT. TECH

Location of Overflow:

( Include system, MH#, etc.)

LLRI - MANHOLE # B13

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow:

1 (gpm)

Duration of Overflow:

6 hrs

Minutes / Hours

Closest Receiving Natural Body of Water:

LITTLE LEHIGH CREEK

Describe Event :

Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

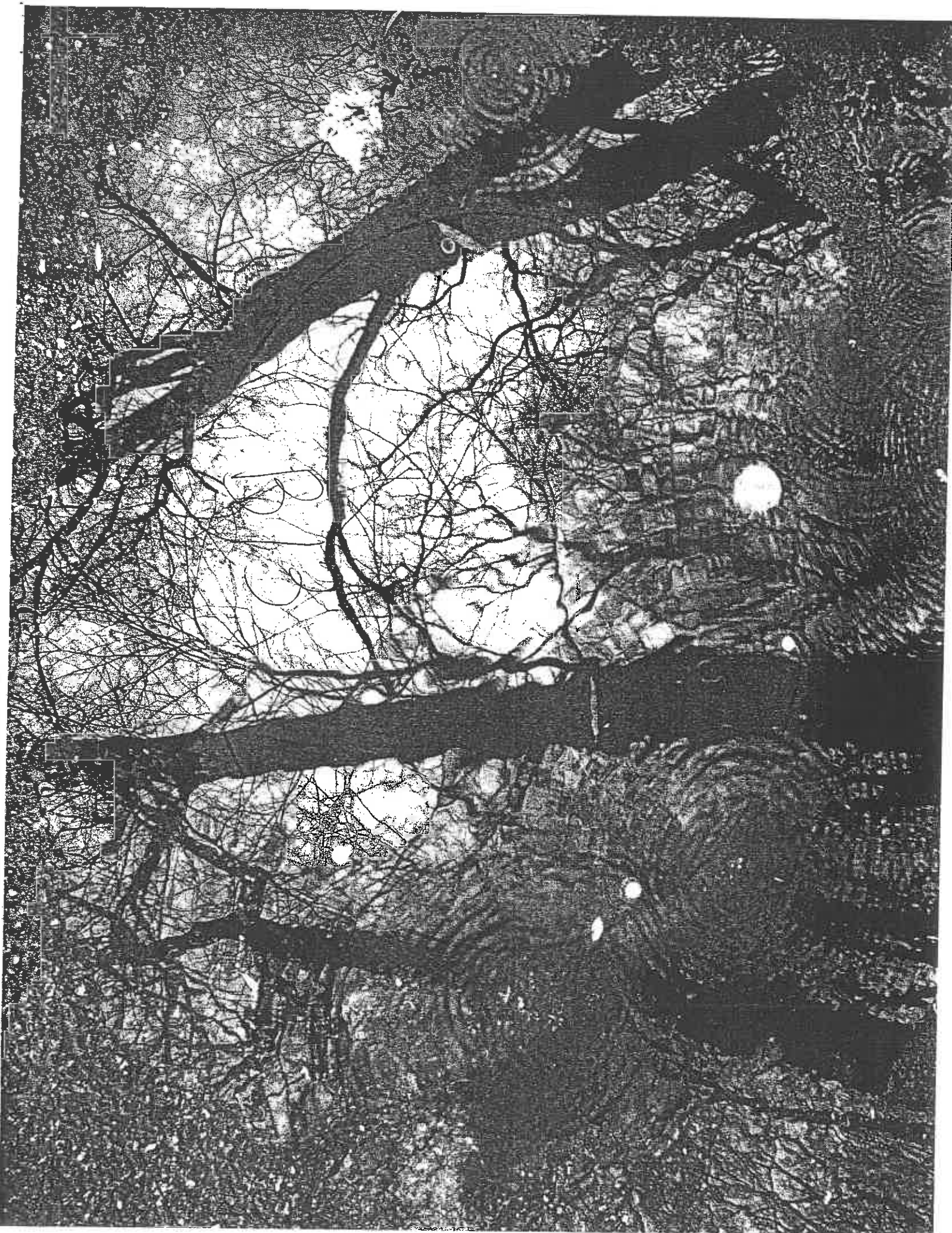
HEAVY RAIN 3"

Describe Remediation Efforts:

Signature: [Signature]

Date: 11-23-11





# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: Nov. 23, 2011

Report By: BOB CROOKS

Time: 9:20 AM

Title: URGENT. TECH

Location of Overflow:

( Include system, MH#, etc.)

1185- MANHOLE # 814

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 1 (gpm)

Duration of Overflow: 6 hrs Minutes / Hours

Closest Receiving Natural Body of Water:

LITTLE LEHIGH CREEK

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN 3"

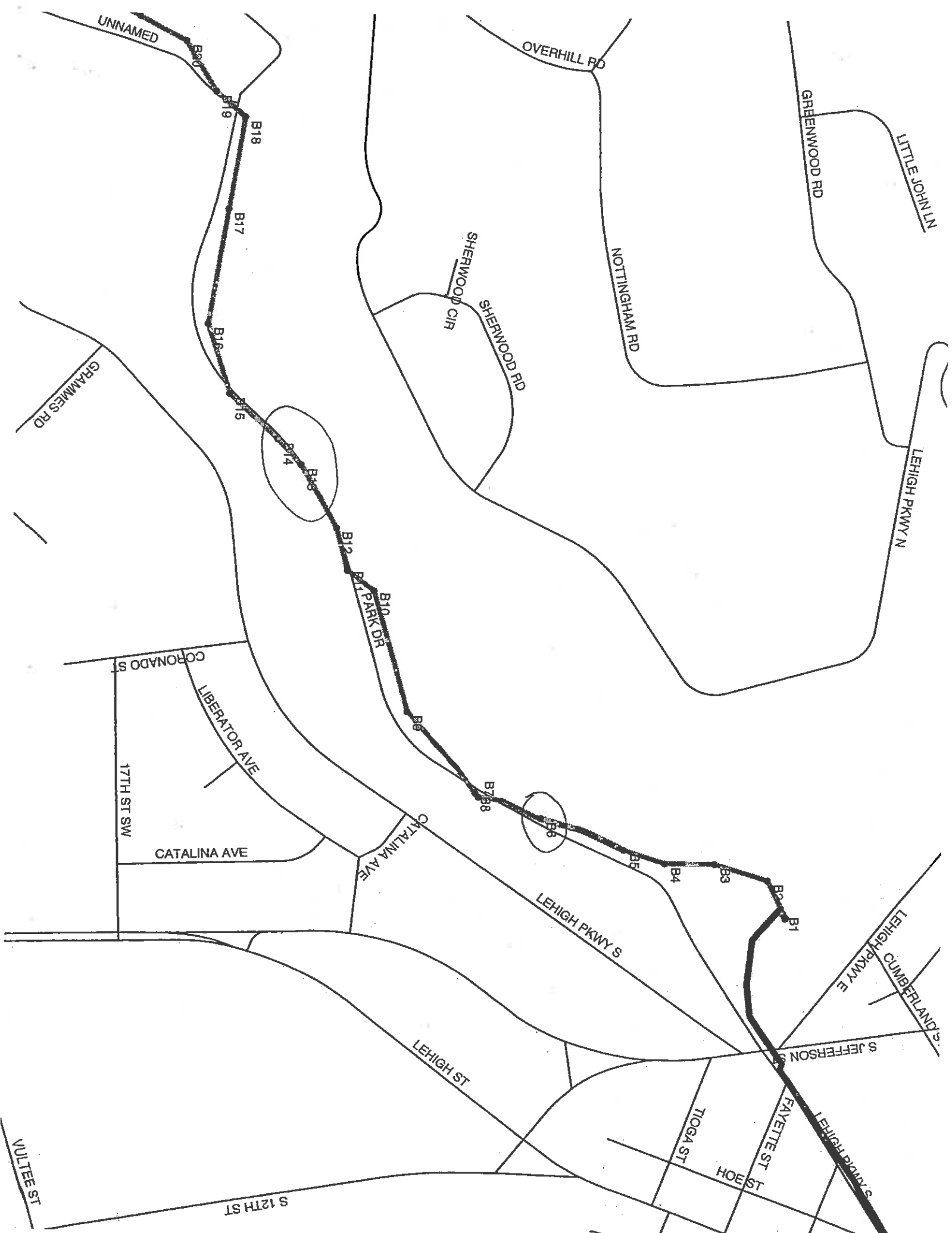
Describe Remediation Efforts:

Signature: [Signature]

Date: 11-23-11







UNNAMED

OVERHILL RD

GREENWOOD RD

LITTLE JOHN LN

NOTTINGHAM RD

LEHIGH PKWY N

SHERWOOD CIR

SHERWOOD RD

GRAMMES RD

B18

B17

B16

B15

B14

B13

B12

B11

B10

PARK DR

B9

B7

B6

B5

B4

B3

B2

B1

CORONADO ST

LIBERATOR AVE

CATALINA AVE

17TH ST SW

CATALINA AVE

LEHIGH PKWY S

LEHIGH ST

LEHIGH PKWY E

CUMBERLAND'S

S JEFFERSON ST

FAYETTE ST

HOE ST

TIOGA ST

S 12TH ST

VULTEE ST

S. JEFFERSON'S

# Western Lenigh Interceptor Wet Weather Manhole Survey

Date: 11-23-11

Manhole No.	Location	Time	Observation	Distance to Flow (ft./in.)	Operator Ints.	Pic #
B1	LLRI	8:00	NO LEAKS			
B2	LLRI	8:10	NO LEAKS			
B3	LLRI	8:20	NO LEAKS			
B4	LLRI	8:30	NO LEAKS			
B5	LLRI	8:40	NO LEAKS			
B6	LLRI	8:45	MINIMAL OVERFLOW AT THIS TIME 1-5 GAL.	10'	B.G.	610
B7	LLRI	8:50	NO LEAKS			
B8	LLRI	8:55	NO LEAKS			
B9	LLRI	8:57	NO LEAKS			
B10	LLRI	9:00	NO LEAKS			
B11	LLRI	9:03	NO LEAKS			
B12	LLRI	9:05	NO LEAKS			
B13	LLRI	9:10	MINIMAL OVERFLOW BUBBLING	30'	B.G.	609
B14	LLRI	9:20	BUBBLING	30'	B.G.	608
B15	LLRI	9:25	NO LEAKS			
B16	LLRI	9:30	NO LEAKS			
B17	LLRI	9:40	NO LEAKS			
B18	LLRI	9:45	NO LEAKS			

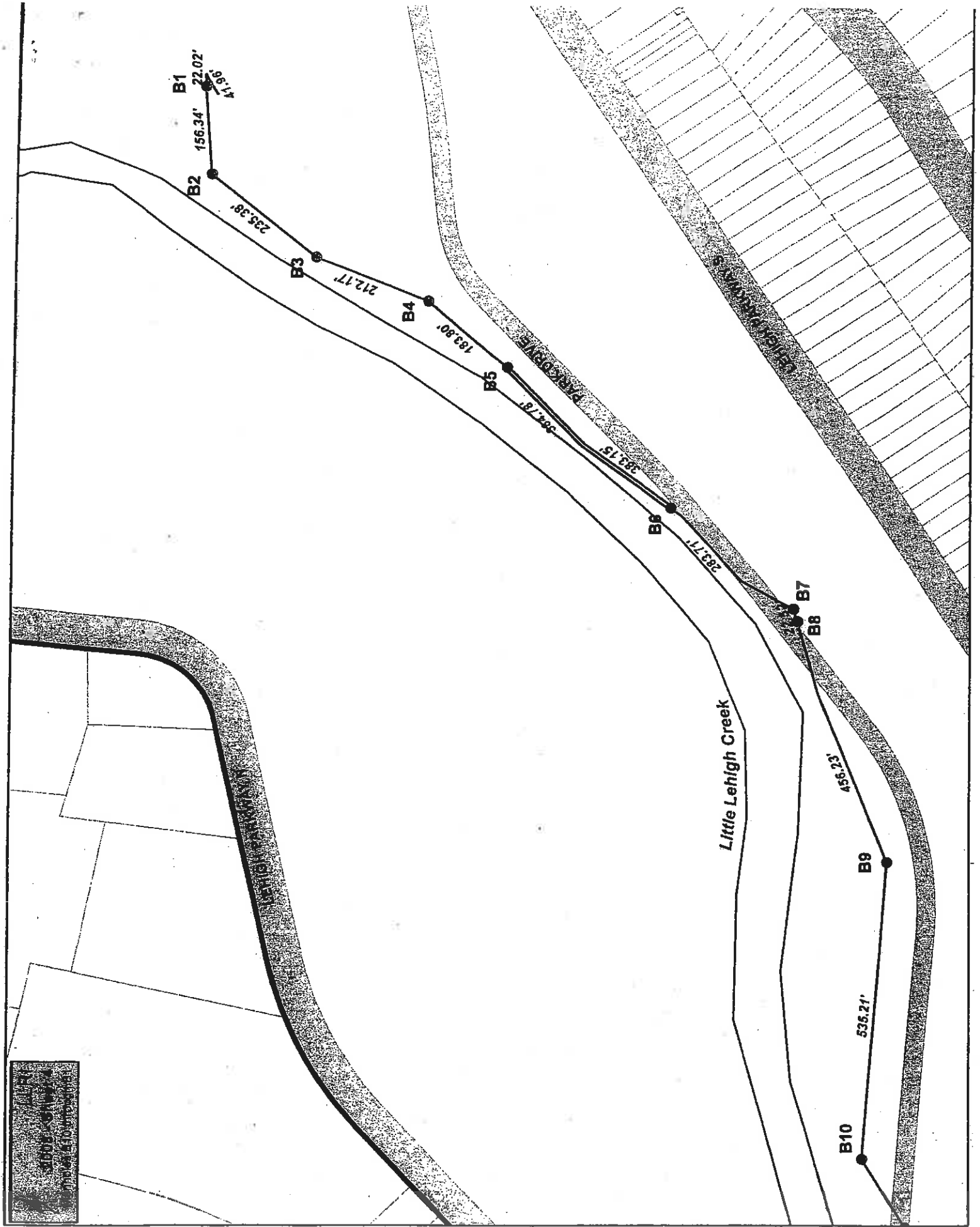


# Western Lehigh Interceptor Wet Weather Manhole Survey

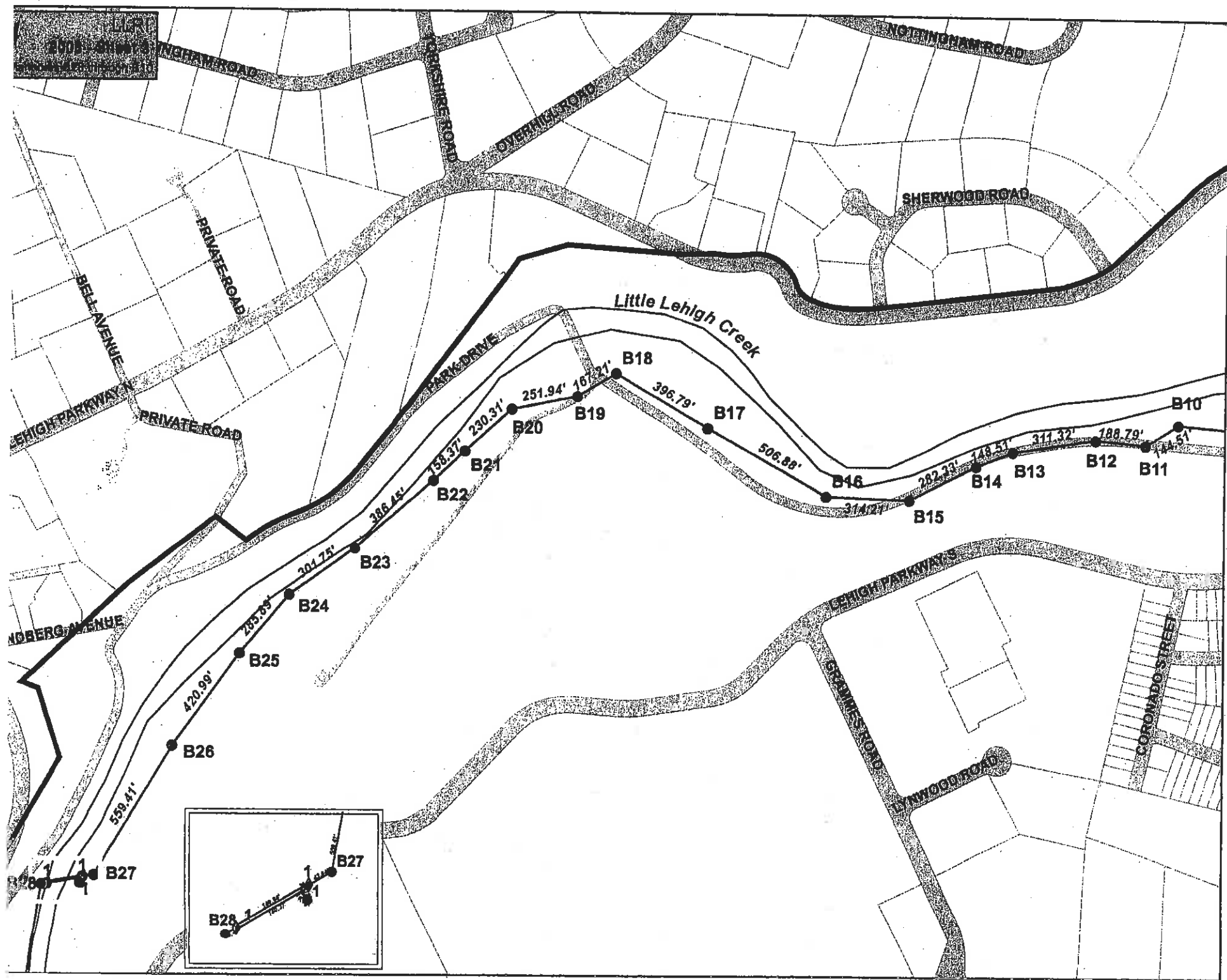
Date: 11-23-11

Manhole No.	Location	Time	Observation	Distance to	Operator	Pic #
				Flow (ft./in.)	Ints.	
B19	LLRI	9:46	NO LEAKS			
B20	LLRI	9:48	NO LEAKS			
B21	LLRI	9:50	NO LEAKS			
B22	LLRI	9:53	NO LEAKS			
B23	LLRI	9:55	NO LEAKS			
B24	LLRI	9:57	NO LEAKS			
B25	LLRI	10:00	UNDERWATER?			
B26	LLRI	10:02	NO LEAKS			
B27	LLRI	10:10	NO LEAKS			
B28	LLRI	10:20	NO LEAKS			
B29	LLRI	10:25	NO LEAKS			
B30	LLRI	10:30	NO LEAKS			
B31	LLRI	10:33	NO LEAKS			
B32	LLRI	10:38	NO LEAKS			
B33	LLRI	10:43	NO LEAKS			
B34	LLRI	10:49	NO LEAKS			
B35	LLRI	10:53	NO LEAKS			
B36	LLRI	11:05	NO LEAKS			

3608-5149-4  
10/25/2010



2005-2006  
2007-2008



# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 1-Sep-11

Report By: Jimmy Wieder

Time: N/A

Title: Macungie Borough

Location of Overflow: MH L129  
( Include system, MH#, etc.) \_\_\_\_\_

Responsible Party or Facility: Lehigh County Authority

Rate of Overflow: N/A (gpm) Duration of Overflow: N/A Minutes / Hours

Closest Receiving Natural Body of Water: Swabia

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. On September 1, 2011, Jimmy Wieder inspected the LCA manholes

Describe Remediation Efforts: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Karl L. Steiner

Date: 9/1/2011



# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/6/11

Report By: ERIC S.

Time: 10:00 AM

Title: MAINT. TECH III

Location of Overflow: B2  
( Include system, MH#, etc.) LITTLE LEHIGH RELIEF

Responsible Party or Facility: LEHIGH COUNTY AUTH.

Rate of Overflow: 5-10 (gpm) Duration of Overflow: 24-36 Minutes (Hours)

Closest Receiving Natural Body of Water: LITTLE LEHIGH

Describe Event: Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

Went to Pump station noticed wastewater coming out around lid

Describe Remediation Efforts: clean up area, spread lime - when event is over

Signature: Eric Schellhorne

Date: 9/8/11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/7/11

Report By: Chris Knept

Time: 8:30

Title: Maint. Tech 2

Location of Overflow:

( Include system, MH#, etc.)

Lehigh Parkway  
MH B-9

Responsible Party or Facility:

LCA

Rate of Overflow: 20 (gpm)

Duration of Overflow: 5 1/2 hrs. Minutes / Hours

Closest Receiving Natural Body of Water:

Little Lehigh

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

Bob Gross and I arrived at 8:30. We had  
seen overflow due to the rain. Due to pressure the manhole  
ring broke off the cement casing.

Describe Remediation Efforts:

Must anchor ring and recement.

Signature:

Chris Knept

Date:

9-8-11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/7/11

Report By: Chris Knopf

Time: 8:50

Title: Maint. Tech 2

Location of Overflow:  
( Include system, MH#, etc.)

Lehigh Parkway  
Siphon Pit #4, Between B27 and B28 MH

Responsible Party or Facility:

LCA

Rate of Overflow: 20 (gpm)

Duration of Overflow: 5 1/2 hrs. Minutes / Hours

Closest Receiving Natural Body of Water:

Little Lehigh

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

On arrival at 8:50 we noticed the  
overflow out of the doors, due to the heavy rainfall.

Describe Remediation Efforts:

May look into a way of sealing the doors

Signature:

Chris Knopf

Date:

9-8-11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9-7-11

Report By: Chris Knopf

Time: 9:00

Title: Maint. Tech 2

Location of Overflow:

( Include system, MH#, etc.)

Lehigh Parkway  
MN B-1

Responsible Party or Facility:

LCA

Rate of Overflow: 5 (gpm)

Duration of Overflow: 5 1/2 hrs. Minutes / Hours

Closest Receiving Natural Body of Water:

Little Lehigh

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

Upon arrival we noticed water coming out of  
a bolt hole.

Describe Remediation Efforts:

When flows are down reinstall bolt.

Signature:

Chris Knopf

Date:

9-8-11



# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9-7-11

Report By: Chris Knopf

Time: 8:40

Title: Maint. Tech 2

Location of Overflow:

( Include system, MH#, etc.)

Lehigh Parkway  
MH B21

Responsible Party or Facility:

LCA

Rate of Overflow: 15 (gpm)

Duration of Overflow: 5 1/2 hrs Minutes / Hours

Closest Receiving Natural Body of Water:

Little Lehigh

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

Upon arrival Bob Gross and I noticed the water coming up around the manhole. The manhole appears to have come off / separated from the concrete. We must dig up to verify. There also a piece missing from the frame.

Describe Remediation Efforts:

Must dig up and reattach the frame and cement, also should replace the frame since there is a piece missing.

Signature:

Chris Knopf

Date:

9-8-11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/8/11

Report By: ROBERT W SPIRK

Time: 9:10

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TOWNSHIP  
WESTERN LEHIGH INTERSECTOR MH 062

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 75 To 100 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

Heavy rain event

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/8/11

Report By: ROBERT W SPIRK

Time: 9:12

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TWPSP  
WESTERN LEHIGH INTERSECTOR MH U 63

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 10 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature: Robert W Spirk

Date: 9/13/11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/8/11

Report By: ROBERT W SPIRK

Time: 9:15

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TOWNSHIP  
WESTERN LEHIGH INTERSECTOR MH U64

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 25 TO 50 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11



# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/8/11

Report By: ROBERT W SPIRK

Time: 13:30

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TOWNSHIP  
WESTERN LEHIGH INTERSECTOR MH 058

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 10 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/9/11

Report By: ROBERT W SPIRK

Time: 8:30

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TWP  
WESTERN LEHIGH INTERSECTOR U 58

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 5 TO 10 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/9/11

Report By: ROBERT W SPIRK

Time: 8:05

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TOWNSHIP  
WESTERN LEHIGH INTERSECTOR UG2

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY UG2

Rate of Overflow: 25 TO 50 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event:

Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/9/11

Report By: ROBERT W SPIRK

Time: 8:10

Title: MAINT TECH

Location of Overflow:

( Include system, MH#, etc.)

UPPER MACUNGIE TOWNSHIP  
WESTERN LEHIGH INTERSECTOR U 163

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 5 TO 10 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event :

Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11



# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 9/9/11

Report By: ROBERT W SPIRK

Time: 8:15

Title: MAINT TECH

Location of Overflow:

(Include system, MH#, etc.)

UPPER MACUNGIE TWP

WESTERN LEHIGH INTERSECTOR U 64

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow: 5 TO 10 (gpm)

Duration of Overflow: 24 HRS Minutes / Hours

Closest Receiving Natural Body of Water:

IRON RUN CREEK

Describe Event: Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. HEAVY RAIN EVENT

Describe Remediation Efforts:

Signature:

Robert W Spirk

Date:

9/13/11

# Sanitary Sewer Overflow (SSO) Report to PADEP

12. Other comments ?

City line was open and clear.

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 31-Aug-11

Report By: Chris Boehm

Time: N/A

Title: Macungie Borough Manager

Location of Overflow: Manhole L-130 in Macungie Memorial Park  
( Include system, MH#, etc.) \_\_\_\_\_

Responsible Party or Facility: Lehigh County Authority

Rate of Overflow: N/A (gpm) Duration of Overflow: N/A Minutes / Hours

Closest Receiving Natural Body of Water: Swabia

Describe Event : Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed. Manhole L-130 in Macungie Memorial Park was under water and overflowed into the park.

Describe Remediation Efforts: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: K. J. Boehm

Date: 8/31/2011

# LEHIGH COUNTY AUTHORITY SANITARY SEWER OVERFLOW REPORT

Date: 8-29-11

Report By: ERIC SCHELLHAMER

Time: 11:33 AM

Title: MAINT. TECK III

Location of Overflow:

(Include system, MH#, etc.)

MH B9 (UPSTREAM OF PUMP ST.)  
LITTLE LEHIGH RELIEF INTERCEPTOR

Responsible Party or Facility:

LEHIGH COUNTY AUTHORITY

Rate of Overflow:

N/A

(gpm)

Duration of Overflow:

N/A

Minutes / Hours

Closest Receiving Natural Body of Water:

LITTLE LEHIGH

Describe Event :

Include cause, individuals involved, eyewitness accounts, etc. Attach map or other reference material as needed.

SMALL AREAS OF GRAY MATTER LEFT BEHIND  
IN AREA AROUND MANHOLE (SEE PHOTOS)

Describe Remediation Efforts:

SPREAD LIME, FILL IN VOIDS WITH TOPSOIL AND  
PLANT GRASS (SEED)

Signature:

Eric Schellhamer

Date:

8/30/11

RECEIVED

SEP 06 2011

BETHLEHEM DISTRICT OFFICE  
PA DEP



*Resp 4/5/10*  
Pennsylvania Department of Environmental Protection *NO DMS*

Bethlehem District Office  
4530 Bath Pike  
Bethlehem, PA 18017  
March 24, 2010

Bethlehem District Office

(610) 861-2070  
FAX (610) 861-2072

## **NOTICE OF VIOLATION**

**CERTIFIED MAIL NO. 70081830000364502869**

Lehigh County Authority  
P.O. Box 3348  
1053 Spruce Street  
Allentown, PA 18106

Attention: Mr. Frank Leist, General Manager

RE: Sewage  
Lehigh County Authority  
Park Pump Station  
WQ Management Permit No. 3979410  
City of Allentown, Lehigh County

Dear Mr. Leist:

On February 25, 2010, Lehigh County Authority's (LCA) Park Pump Station malfunctioned. The malfunction occurred due to a problem with the "Bubbler Line" which monitors the sewage elevation in the interceptor line and activates a gate which allows sewage to flow to the Park Pump Station. The malfunction caused several sanitary sewer manholes to overflow on the parkway path along the Little Lehigh Creek. Preliminary information indicates that LCA discovered the malfunction and sanitary sewer overflows on Saturday, February 27, 2010. LCA did not notify the Department about the Bubbler Line failure or resulting sanitary sewer overflows.

The Department was made aware of the Bubbler Line failure by the City of Allentown on March 1, 2010. Section 91.33(a) of Title 25 of the Pennsylvania Code, 25 Pa. Code Section 91.33(a) requires a person to report any noncompliance or incidents causing or threatening pollution to the Department by telephone immediately. In accordance with Part 122.41(1)(6) of Title 40 of the Code of Federal Regulations, 40 CFR 122.41(1)(6), the Department defines immediately as within 24 hours. The Bubbler Line failure caused pollution to the parkway and the Little Lehigh Creek.

Please be advised that failure to comply with the terms and conditions of your permit and the regulations cited above are violations of your Water Quality Management



bcc: M. Bedrin  
K. Crowley  
P. Musinski  
S. Ripple  
E. Bloxham/Central Office (2 Copies)  
D. Fritz  
M. Carmon  
File



**LEHIGH COUNTY AUTHORITY**

1053 SPRUCE STREET • P.O. BOX 3348 • ALLENTOWN, PA 18106-0348

610-398-2503 • FAX 610-398-8413

email: service@lehighcountyauthority.org

*Am*  
CC:EB

April 1, 2010

Sheena Ripple  
Water Quality Specialist  
Water Management Program  
Pennsylvania Department of Environmental Protection  
4530 Bath Pike  
Bethlehem, PA 18017

RECEIVED

APR 05 2010

BETHLEHEM DISTRICT OFFICE  
PA DEP

Subject: NOTICE OF VIOLATION  
Park Pumping Station  
WQ Management Permit No. 3979410  
Allentown, PA

WATER QUALITY

COUNTY: Lehigh

APR 05 2010

Dear Ms. Ripple:

MUNIC: City of Allentown  
FACILITY: LCA  
FILE CODE: Correspondence

Pursuant to your request, the following details the cause of the Park Pump Station equipment failure and corrective actions that have been taken to eliminate future violations.

**Summary of Events /Cause:**

On Saturday morning, February 27, 2010 our Operations Forman checked the SCADA telemetry and trending for the Park Pumping Station (PPS) and noticed that the interceptor level trending showed little variation from the 4.2-foot level starting from approximately 10:00 a.m. on Thursday, February 25, 2010. A subsequent check of the pump run-time trending during this same period indicated that the pump station did not run. Given that the PPS typically runs at least once daily, it indicated a potential malfunction and he immediately went to the PPS to investigate. (*Note: In normal operating mode the when interceptor level reaches 8.5 feet it opens the gate to allow wastewater into the wet well and starts the pump station*).

Upon arrival at the PPS at approximately 10:45 a.m. on Saturday, February 27, 2010, a malfunction in the bubbler system was confirmed and was repaired. At that time the interceptor level was below the 8.5-foot start point. In addition, no active SSOs were observed, however there was evidence that an SSO had occurred from a City of Allentown (COA) manhole sometime before Saturday morning. LCA facilities in the same vicinity showed no evidence of SSOs. LCA personnel did not notify the COA at this time.



On Monday morning, when the Operations Manager was made aware of the event, he called Robert Kerchusky of the City of Allentown and explained the situation. LCA and COA personnel worked together and walked our respective facilities and identified that approximately four City of Allentown manholes had overflowed. There was no evidence of overflows from LCA facilities, we believe primarily because LCA manholes are bolt down, where the City facilities that overflowed are not. LCA personnel assisted COA personnel in spreading lime.

In the 25 plus years that PPS has been in operation, this was the first failure of the bubbler line resulting in a pump start failure.

Because of the configuration of the dual interceptors that carry both LCA and COA flows to the PPS and the fact that gravity flow by-passes the PPS it is impossible to determine volume of sewage that overflowed.

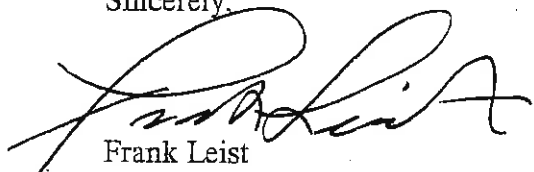
**Corrective Actions:**

First, Control-X Service Corporation, our service contractor, replaced a defective pressure transmitter, re-calibrated the bubbler-system and confirmed that the City of Allentown interceptor level readings at the PPS matched ours. Second, LCA installed a back-up float system that will activate the station as needed and provide an alarm in the event of a future bubbler line failure. Finally, LCA reviewed and modified our notification procedures and has provided refresher training to the LCA operations department personnel.

LCA is cognizant of our responsibilities pursuant to the conditions of our Water Quality Management Permit and has taken measures to eliminate a future recurrence of this type.

If you have any questions or require additional information, please call me at (610) 398-2503.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Leist", written over a horizontal line.

Frank Leist  
Operations / Capital Works Manager

cc. Aurel Arndt, General Manager, LCA  
Robert Kerchusky, City of Allentown